## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL No. 2327

Wave 12

THIS DOCUMENT RELATES TO:

Wave 12 cases listed on Plaintiffs' Exhibit A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES REGARDING CHRISTOPHER RAMSEY, M.D. FOR WAVE 12

Plaintiffs filed a Notice of Adoption [Dkt. 8727] in the Wave 12 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Christopher Ramsey, M.D. and Supporting Memorandum from Ethicon Wave 1, Dkt. 2117 (motion), 2118 (memorandum in support), and 3050 (reply). Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Christopher Ramsey, M.D. for Ethicon Wave 3, Dkt. 2908. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561

## william.gage@butlersnow.com

/s/ Susan M. Robinson Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

> /s/ William M. Gage William M. Gage

50163096.v1